

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

DOC NO
REC'D/FILED

2020 AUG 19 PM 6:12

PETER OPPENEER
CLERK US DIST COURT
WD OF WI

UNITED STATES OF AMERICA

SEALED INDICTMENT

v.

Case No.

20 CR 105 WMC

KONG VANG,
PADER YANG, and
SHOUA LEE,

18 U.S.C. § 924(c)
21 U.S.C. § 846
21 U.S.C. § 841(a)(1)
18 U.S.C. § 922(g)(1)

Defendants.

THE GRAND JURY CHARGES:

COUNT 1

On or about June 30, 2020, in the Western District of Wisconsin, the defendants,

KONG VANG and
SHOUA LEE,

knowing they had previously been convicted of offenses punishable by a term of imprisonment exceeding one year, knowingly and unlawfully possessed in or affecting commerce a Hi-Point .40 caliber handgun, said firearm having previously traveled in and affected interstate commerce.

(In violation of Title 18, United States Code, Section 922(g)(1)).

COUNT 2

From on or about April 8, 2020 to on or about July 15, 2020, in the Western District of Wisconsin and elsewhere, the defendants,

KONG VANG and
PADER YANG,

knowingly and intentionally conspired with each other to distribute 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

(All in violation of Title 21, United States Code, Section 846).

COUNT 3

On or about July 15, 2020, in the Western District of Wisconsin, the defendants,

KONG VANG and
PADER YANG,

knowingly and intentionally possessed with intent to distribute 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

(In violation of Title 21, United States Code, Section 841(a)(1)).

COUNT 4

On or about July 15, 2020, in the Western District of Wisconsin, the defendant,

KONG VANG,

knowing he had previously been convicted of an offense punishable by a term of imprisonment exceeding one year, knowingly and unlawfully possessed in or affecting commerce a Hi-Point .40 caliber handgun, an IMI Desert Eagle 9mm handgun, a Taurus .380 caliber handgun, a Llama 9mm handgun, a Lorcin .380 caliber handgun, Blazer 9mm ammunition, Federal 9mm ammunition, Winchester .40 caliber, 12 gauge and .22

caliber ammunition, and PPU .380 caliber ammunition, said firearms and ammunition having previously traveled in and affected interstate commerce.

(In violation of Title 18, United States Code, Section 922(g)(1)).

COUNT 5

On or about July 15, 2020, in the Western District of Wisconsin, the defendants,

KONG VANG and
PADER YANG,

knowingly and unlawfully possessed a loaded Hi-Point .40 caliber handgun, a loaded IMI Desert Eagle 9mm handgun, a loaded Taurus .380 caliber handgun, a loaded Llama 9mm handgun, a loaded Lorcin .380 caliber handgun in furtherance of a drug trafficking crime, specifically, possession with intent to distribute a mixture or substance containing a detectable amount of methamphetamine as alleged in Count 3 of this indictment.

(In violation of Title 18, United States Code, Section 924(c)).

A TRUE BILL



PRESIDING JUROR

Indictment returned: 08/19/2020



SCOTT C. BLADER
United States Attorney